

To; FCC Commissioners
Washington, DC

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1998 Biennial Regulatory

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SEP 1 1998

Review adm't., part 97 of the
Commissiom's Amateur Service
rules FCC WT docket 98-143

FCC MAIL ROOM

Dear Commissioners,

I Hold a General Class Lic. And have been a Amateur
radio Op. since 1957

Here is my comments on Lic. re-structurting. Have (3) three classes of
Licensing (Which is the goal of the FCC) and they are.

- A- Extra @ 20 wpm code proficiency, @ one minute solid copy.
- B- General@ 13 " " " " " " " "
- C- Technician@ 5 " " " " " " " "

ORIGINAL

We don't need the Novice, Tech plus, or the Advanced classes. Either meld the
Advanced with the Extras, Or the Generals in with the Advanced
In the 60's the Extra and Advanced where generated as a Incentive classes. I see
the Advanced class as a overlap of the general class, and as a unnecessary class
license. I also agree that the Tech and novice class are a overlap of each other.

So to reach a 3 tier class system, I recommend the above suggestion.

On the Morse code! It took me awhile to learn the code,now I do 15 to 20
comfortably. Its a form of discipline, Which is needed within the Amateur
Community. And as far as the written requirements, I believe in what the FCC sets
as the standard of electronic knowledge, needed.

As for the "Power" restrictions, with the advent of Lic. restructuring, The Tech
class, if they get HF Privileges, should be limited to 100 watts cw only, and in the
same operating frequencies as the novices now have. And with the generals and
higher, the standard 1500 watts output. (I remember being rock bound and 50watts
and I was happy to have that)

As for Disability waivers/ Definitely needs some improvement. There has to be, two
doctor certificates to indicate the candidate for a lic. waiver. And I recommend each
state have a 5 member panel to do the testing. The 5 member panel is unknown to
the lic. candidate,with maybe two alternates, A minimum of three test panel
members is needed to pass the test and wave the expenition.

I believe in the (3) member panel VE testing setup. Therefore I would be against the
Advanced class giving tests . PLEASE keep the 3 member test setup, I just think
the door would be opened to more abuse , of testing .

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On ENFORCEMENT, While there is a need for enforcement, I'm not aware of the ARRL thinking, We have OO's(Offical Observers) They should be given some authority to warn in the name of the FCC(With some training on this matter, and Certified) and have a system of "How many citations for infractions, could be initiated, ie [all OO's, E-mail monthly reports to the FCC and the ARRL on given citations mailed out, and be regeristed mail to the offenders]. When a known amount of citations FCC number) is noted on a indivual, then a show cause,or hearing, before a volunteer STATE panel of (3) OO's is required, before entering INTO A FCC hearing. (ITS A SORT OF A MEDIATION PANEL, TO GIVE A OFFENDING VIOLATOR A CHANCE TO AMEND THERE WAYS.before going to court.

I'm in agreement with "POWER" in the RF exposure table, with PEP input to antenna.

Also in agreement with, No one holding a FCC ticket. may apply for a Reciprocal permit for a alien amateur license.

Also in agreement to phase out RACES station license

**All in all, If 3 licenses structure is the GOAL...go with A-Extra, B-general,C-Tech.
20wpm 13wpm 5wpm**

Thanks for giving me the chance to address the commission,Which the ARRL didn't do for me.

Sincerely yours,

**John J. Keating, WA2FYL
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